

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MUNUSAMY KANDASAMY)
Plaintiff,)
v.)
ADVANCED SOFTWARE) **Case No. 1:18-cv-00029 (AJT-TCB)**
SYSTEMS, INC.,)
Defendant.)

JOINT MOTION FOR ENTRY OF ORDER OF DISMISSAL

Defendant Advanced Software Systems, Inc. (“Assyst”) and Plaintiff Munusamy Kandasamy jointly move this Court to enter the proposed order submitted herewith dismissing Plaintiff’s claims against Assyst with prejudice and providing for other terms and conditions of the parties’ settlement between them regarding this matter.

Further, the parties are also requesting two weeks from the date of the entry of the order to move for sanctions in a manner not inconsistent with the terms of the proposed order. Assyst fully intends to move for sanctions against former plaintiff Rajender Salgam for the fraud upon the Court described in Assyst’s Memorandum in Support of Assyst’s Motion to Compel Limited Discovery and to Stay Due to Fraud Upon the Court (Dkt. 51), as well as in subsequent filings, and for related misconduct by Mr. Salgam concerning this litigation.

WHEREAS the parties request that the proposed consent order be entered and that they be awarded all further just and proper relief.

Respectfully Submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2018, I filed the foregoing document with the Clerk of Court using the Court's CM/ECF system, which will then send notification of this filing to the following filing users:

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